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APPLICATION GRANTED  
 SO ORDERED *Vernon S. Broderick*  
 VERNON S. BRODERICK  
 U.S.D.J. 10/21/2019

VIA ECF

The Honorable Vernon S. Broderick  
 United States District Court for the Southern District of New York  
 40 Foley Square  
 New York, NY 10007  
 BroderickNYSDChambers@nysd.uscourts.gov

Re: *Vale S.A. v. BSG Resources Limited*, No. 19-cv-3619

Dear Judge Broderick:

We write on behalf of Vale S.A. (“Vale”), the petitioner in the above-captioned summary proceeding for recognition and enforcement of Vale’s arbitral award (the “Award”) against BSG Resources Limited (“BSGR”), regarding BSGR’s October 18, 2019 letter asking this Court to defer ruling on Vale’s Petition and to stay enforcement of the Award (“BSGR’s Letter”) [ECF No. 33].

Rather than simply setting forth its position on whether the “sole ground for opposing recognition and enforcement in the United States . . . is now moot” as required by your Honor’s October 4, 2019 Order [ECF No. 32], BSGR’s Letter offers extensive argument on its claimed alternative grounds for relief and raises an entirely new issue regarding potential injunctive relief. Accordingly, Vale respectfully requests the Court’s permission to file a brief response to BSGR’s Letter by October 25, 2019.

Respectfully submitted,

/s/ Jonathan I. Blackman

cc: Frederick Hyman, Esq.  
 Michael R. Lastowski, Esq.